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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR-08-0784 SBA
)	
Plaintiff,)	STIPULATED REQUEST TO CONTINUE
)	HEARING DATE TO APRIL 7, 2009 AND
v.)	TO EXCLUDE TIME UNDER THE
)	SPEEDY TRIAL ACT
JUAN LUIS CARRASCO,)	
)	
Defendant.)	Date: March 17, 2009
)	Time: 9:00 a.m.
)	Court: Hon. Sandra Brown
)	Armstrong

The above-captioned matter is set on March 17, 2009 before this Court for a status hearing. The parties request that this Court continue the hearing to April 7, 2009 at 9:00 a.m. and that the Court exclude time under the Speedy Trial Act between the date of this stipulation and April 7, 2009.

The government has produced discovery and defense counsel has recently reviewed substantial physical evidence in the custody of the Bureau of Alcohol, Tobacco, Firearms, and Explosives and the Oakland Police Department. Defendant needs additional time to review the discovery that has been produced and to investigate this matter. Specifically, although the indictment only charges one violation of Title 18, United States Code, Section 922(g), the

STIP. REQ. TO CONTINUE HEARING DATE TO APRIL 7, 2009 AND TO EXCLUDE TIME
No. CR-08-0784 SBA

1 government has informed defense counsel of its intent to pursue additional charges. Defense
2 counsel needs additional time to analyze discovery related to those potential additional charges
3 and to investigate those potential charges further. The parties agree the ends of justice served by
4 granting the continuance outweigh the best interests of the public and defendant in a speedy trial.
5 Therefore, the parties further stipulate and request that the Court exclude time between the date
6 of this stipulation and April 7, 2009 under the Speedy Trial Act for effective preparation of
7 counsel and pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

8
9 DATED: March 12, 2009
10

11
12 /s/
JAMES C. MANN
Assistant United States Attorney
13 Counsel for United States

/s/
EDWARD A. SMOCK
Counsel for Juan Luis Carrasco

1 additional charges and to investigate those potential charges further. The parties agree the ends
2 of justice served by granting the continuance outweigh the best interests of the public and
3 defendant in a speedy trial. For these stated reasons, the Court finds that the ends of justice
4 served by granting the continuance outweigh the best interests of the public and defendant in a
5 speedy trial. Good cause appearing therefor, and pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv),

6 **IT IS HEREBY ORDERED** that the status hearing in this matter is continued from
7 March 17, 2009 to April 7, 2009 at 9:00 a.m., and that time between March 12, 2009 and April 7,
8 2009 is excluded under the Speedy Trial Act to allow for the effective preparation of counsel,
9 taking into account the exercise of due diligence.

10
11 DATED: 3/13/09


HON. SAUNDRA BROWN ARMSTRONG
United States District Judge